

**IN UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

ZACHARY FORT, NEW MEXICO SHOOTING	:	
SPORTS ASSOCIATION, FIREARMS POLICY	:	
COALITION, INC., and SECOND AMENDMENT	:	
FOUNDATION,	:	
<i>Plaintiffs,</i>	:	Civil Action No.
	:	
v.	:	
	:	
	:	
MICHELLE LUJAN GRISHAM, individually and	:	
in her official capacity as the Governor of New	:	<u>DECLARATION OF BRANDON</u>
Mexico, PATRICK M. ALLEN, individually and in	:	<u>COMBS IN SUPPORT OF</u>
his official capacity as the Cabinet Secretary for the	:	<u>PLAINTIFFS' MOTION FOR A</u>
New Mexico Department of Health; JASON R.	:	<u>TEMPORARY RESTRAINING</u>
BOWIE, individually and in his official capacity as	:	<u>ORDER AND PRELIMINARY</u>
the Cabinet Secretary of the New Mexico	:	<u>INJUNCTION</u>
Department of Public Safety, and W. TROY	:	
WEISLER, individually and in his official capacity	:	
as the Chief of the New Mexico State Police,	:	
<i>Defendants.</i>	:	

I, Brandon Combs, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following statements are true and correct to the best of my knowledge:

1. I am over 18 years of age, competent to testify, and have personal knowledge of the matters stated herein. I make this declaration in support of plaintiffs' emergency motion for a temporary restraining order and preliminary injunction.
2. I am the President of Firearms Policy Coalition, Inc. ("FPC").
3. FPC is a nonprofit organization incorporated in Delaware with a primary place of business in Clark County, Nevada.
4. FPC works to create a world of maximal human liberty and freedom and to promote and protect individual liberty, private property, and economic freedoms. It seeks to

protect, defend, and advance the People's rights, especially but not limited to the inalienable, fundamental, and individual right to keep and bear arms and protect the means by which individuals may exercise the right to carry and use firearms.

5. FPC has members nationwide, including in the State of New Mexico, including Zachary Fort.

6. FPC has filed this lawsuit on behalf of its members, including Fort, whose rights to carry firearms in public for lawful purposes are being abridged by the unconstitutional emergency declarations and orders challenged here.

DATED this 11th day of September, 2023.



Brandon Combs
President
Firearms Policy Coalition, Inc.